

Vakoc, Misha

From: Pongkhamsing, Chan
Sent: Friday, November 01, 2019 12:56 PM
To: Vakoc, Misha
Cc: Levo, Brian
Subject: FW: PFAS Whidbey Island
Attachments: More PFAS 10-29-19 SENT.pdf

Categories: Navy MS4 GP Admin Record Materials

Attached is Mr. Abraham's comments of concern on NASWI's contamination issues.

Thank You and Respectfully,



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From: Richard Abraham <(b) (6)>
Sent: Wednesday, October 30, 2019 5:08 AM
To: Pongkhamsing, Chan <Pongkhamsing.Chan@epa.gov>
Subject: PFAS Whidbey Island

Hello Chan,

We met at the Navy's RAB meeting in Whidbey. Can you tell me who the 'toxicologist' was on the RAB. He drank the water that now of the citizens brought to the RAB meeting. I would like to communicate with him and can't find the info on the Navy's website.

I have attached info on the PFAS issue raised by the community

Much Thanks
Richard Abraham
(b) (6)

More PFASs Found In Surface Water and Aquifer On Whidbey

Rick Abraham 10-29-2019

The Navy found PFAS chemicals in water coming from its base in Oak Harbor more than a year ago – but didn't reveal all that were found. Neither did it disclose that it knew, nine months ago, PFASs had seeped to portions of the aquifer.

In October of last year the Navy announced that two PFASs had been found in Clover Valley Creek and Lake.ⁱ However, it was not until October 2019, a year later, that reports were posted on a Navy website showing that six PFASs had actually been found—in every monthly sample from September 2018 to September 2019.ⁱⁱ

PFAS chemicals don't breakdown, accumulate in the body, and are linked health problems including cancer. There are 114 properties in the Clover Creek and Lake area where water is still used for irrigating, and until news of contamination, watering cattle. The Creek and Lake empties to Dugall Bay and a Salmon Restoration Area.ⁱⁱⁱ

The two PFASs the Navy first admitted to finding in the surface water were, PFOA and PFOS. But, also found, in every sample taken from September 2018 through September 2019 were PFHXS, PFHXA, PFHPA, and PFBS—the same 'forever' chemicals found in Coupeville's drinking water now being filtered at the Navy's expense.

Citizens wanting to know all the chemicals found in the Creek were told at the Navy's April 2019 Restoration Advisory Board meeting that the analysis reports were completed, but not available at the meeting. Base Commander, Captain Army, said providing the complete analysis was an "action item."^{iv} It was an action not taken for six more months.

When results were finally posted on a Navy website, PFHXS was found at the highest levels in Clover Creek's water up to 90.8 parts per trillion (ppt). It is linked to child development and other health problems and takes about 8 years for the body to rid itself of just half of what it accumulated. PFOA is found up to 39.3 and PFOS up to 143. The total of all PFASs in one sample has been as high as 266.7 ppt.^v

The Navy has been quick to say that contaminated surface water doesn't mean groundwater is contaminated. But, buried within the Navy's websites are summaries of test results from January 2019 showing the contamination of three Clover Creek area wells, with PFOA, PFHXS and/or PFBS.^{vi} The most contaminated well owner didn't receive results until October 21, 2019. The well contained PFOA at 19.2 ppt and PFHXS at 33.6 ppt.

The Navy says it is "committed to open and transparent communication regarding this [PFAS] issue," Its conduct says otherwise. The Navy's public website only counts the wells that had PFOA and PFOS above EPA's Advisory. There is no counting of findings below that level—or the finding of other PFASs. The Navy's practice has been to phone well owners if their test results exceed EPA's Health Advisory Level for PFOA and PFOS—but not tell them if lesser amounts or other PFASs were found. The Navy says that practice will change.^{vii} We'll see.

Not giving people complete timely information about PFAS contamination has been standard Navy practice--and a bad example followed by Coupeville. The Town withheld, for almost a year, information about all the PFASs in its drinking water.^{viii} Both used the same excuse. They didn't tell people because they weren't required to.

In fact, there is no law or regulation that prevents the Navy from telling people about all the chemicals in their water. Withholding such information denies people of opportunities to protect themselves by avoiding exposures, asking for cleanup, and insisting that the Navy replace PFAS containing firefighting foams that caused the contamination.

People could also ask for a public hearing and that more protective measures be included in EPA's Stormwater Discharge Permit that will govern the Navy's discharges to Clover Valley Creek and Dugall Bay. There is a 60- day public comment period and 30 have passed without the public being informed of the extent of PFAS contamination and discharges. Email Misha Vakoc (vakoc.misha@epa.gov) re Permit WAS026611

Most Clover Creek area wells sampled don't show contamination, but all wells haven't been sampled. PFASs are still seeping to the aquifer and still discharging to Dugall Bay—public waters classified by the State as "extraordinary" for aquatic life uses, protected shellfish harvesting, and threatened and endangered species.

ⁱ 'Routine maintenance Reveals Firefighting Foam in base stormwater,' 10-23-2018 Whidbey News Times. Excerpt, "In early October, results came back that showed the contaminants were leaving the base via the creek. Results found 172 parts per trillion at the installation's eastern boundary and 149 parts per trillion near the inlet to Dugualla Bay.

ⁱⁱ Sample results were posted on Navy Restoration Advisory Board (RAB) Website following the filing of a The Navy was asked on 10-5-18 why sample results had not had not been sent to well owners, the Navy responded by email on 10-11-2019 and stated "Unfortunately, we are behind sending hard copies of the sample results but they will receive the letters soon." As of 10-24-2019, those results had still not been sent according to Navy Representatives questioned at the Navys Restoration Advisory Board (RAB) meeting on that date: Freedom of Information Act Request of 10-10-2019. The FOIA request was made because the reports had not been posted. The first sampling was conducted on Clover Valley Creek Analysis Reports were then posted at:

https://www.navfac.navy.mil/navfac_worldwide/pacific/fecs/northwest/about_us/northwest_documents/environmental-restoration/naval-air-station-whidbey-island-restoration-advisory-board.html

ⁱⁱⁱ According to EPA Fact Sheet for NPDES Permit # WAS026611, Clover Valley Creek is, "protected for core summer salmonid habitat; extraordinary primary contact recreation; water supply uses (domestic, industrial, agricultural, stock); and miscellaneous uses (wildlife habitat, harvesting, commerce/navigation, boating, and aesthetics)."

^{iv} Excerpt from RAB meeting minutes Citizen question and navy response: "What else was found in Clover Creek and the drainage ditch leading to Clover Creek besides PFOA and PFOS? I understand 14 compounds were tested. Ms. Leibman and Ms. Bengston did not have the results with them at the meeting...Captain Arny added an action item to provide the results to Mr. Abraham."

^v Results of Clover Valley Creek Surface Water Sampling posted on:

https://www.navfac.navy.mil/navfac_worldwide/pacific/fecs/northwest/about_us/northwest_documents/environmental-restoration/naval-air-station-whidbey-island-restoration-advisory-board.html

^{vi} Sampling results posted on, NASWI_DW Ault Field Phase 4 Data Summary

^{vii} Rick Abraham discussion with Kendra Leibman, Navy RAB co-chair, following Navy Restoration Advisory Board meeting of 10-24-2019.

^{viii} In January of 2017, the Town of Coupeville announced it had independently tested its water for three PFASs and found only one (PFOA). It was later revealed that the Town had been testing its water for six PFASs beginning in November of 2016 but had been posting partial, instead of complete reports it had been receiving.